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January 15, 2002

## **BY ELECTRONIC COMMENT FILING SYSTEM**

Magalie Roman Salas, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Report of Quantum Communications Group, Inc. on  
Implementation of TTY Digital Compatibility for 911  
Emergency Calling for Station KNLF776  
CC Docket No. 94-102**

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Dear Ms. Salas:

On behalf of Quantum Communications Group, Inc. ("Quantum"), pursuant to CC Docket No. 94-102, Fourth Report and Order, we hereby submit its report on implementation of TTY digital compatibility for 911 emergency calling for Station KNLF776. As a preliminary matter, Quantum is operating pursuant to a switch sharing arrangement with TMP Corporation ("TMP"). As a result, Quantum must rely on TMP to make the necessary switch upgrades for Quantum's system to be TTY digital compatible. The information provided herein is based on the information supplied to Quantum by TMP.

### **Development Activities**

#### **(1) Network infrastructure software development**

Tecore, TMP's switch manufacturer and AirNet TMP's and Quantum's infrastructure manufacturer are aware of TTY requirements. Software compliance is under evaluation at this time.

TMP and Quantum are dependent upon a solution being made available by the infrastructure vendors.

## **(2) Handset development and testing plans**

At this point TMP and Quantum are working with handset manufacturers to validate a solution for deployment in their respective networks by the 6-30-2002 date set by the FCC. *See* letter from Alfred Lucas of Motorola to Ed Hall of the Alliance for Telecommunications Industry Solutions dated October 10, 2001 and letter from Chris Wallace of Nokia dated October 10, 2001 submitted in the TTY Forum's October TTY report.

Quantum is dependent not only upon a solution being made available by manufacturers of PCS handsets by the 6-30-02 FCC mandated deadline, but also in being able to have the handsets timely delivered from the manufacturers.

## **(3) Beta testing and lab testing**

TMP and Quantum will begin testing TTY compatible equipment dependent upon solutions provided by network infrastructure and handset vendors.

## **(4) Release and general availability to carriers of network infrastructure software**

TMP and Quantum understand that Airnet is developing a software solution and are awaiting updated reports of software availability from switching and infrastructure vendors.

## **(5) Availability to carriers of full acceptance test units**

TMP and Quantum are awaiting software and hardware availability from switching, infrastructure, and handset vendors.

## **(6) Efforts toward achieving digital wireless solution compatibility with enhanced TTY devices**

TMP and Quantum remain dependent upon the availability of vendor provided solutions to meet the FCC's mandated timeline (6-30-02) to provide 911 TTY access to their respective networks. TMP and Quantum have contacted Airnet seeking to obtain the date of availability for their software and hardware but have yet to be informed of such a date or cost of the solution.

TMP and Quantum expect the GSM functional performance to be similar to the other technologies and meet or exceed all of the TTY Forum's Consumer Group requirements.

## **Testing and Deployment Activities**

### **(7) Carrier coordination of testing with PSAP**

See response to number (2) above.

### **(8) Carrier testing activities, including field testing, consumer end-to-end testing and other necessary tests**

Testing will begin immediately upon receipt of software and hardware. TMP and Quantum are dependent upon network infrastructure vendor solutions.

### **(9) Retail availability of necessary consumer equipment**

Quantum is dependent upon the availability of handsets from vendors. No firm commitment has been received at this time from handset vendors.

### **(10) Geographic scope of network infrastructure deployment**

Quantum will deploy TTY digital compatibility throughout all parts of the Jacksonville, IL BTA (BTA 213) where Quantum is capable of providing service to customers.

Please address any inquiries regarding this matter to the undersigned.

Respectfully submitted,

/s/

Eliot J. Greenwald

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